



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS,
TRIBAL AND PUBLIC
AFFAIRS

December 18, 2012

Leslie Grey
Environmental Protection Specialist, AAL-614
Federal Aviation Administration, Alaska Region, Airports
222 W. 7th Avenue, #14
Anchorage, Alaska 99513-7587

Re: EPA comments on the Draft Environmental Impact Statement for Improvements to the Runway Safety Area at the Kodiak Airport, EPA Project #07-007-FAA.

Dear Ms. Grey:

Thank you for the opportunity to review the Draft Environmental Impact Statement for the Improvements to the Runway Safety Area at the Kodiak Airport project in Kodiak, Alaska (CEQ #20120329). We have reviewed the EIS in accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act.

Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions as well as the adequacy of the EIS in meeting procedural and public disclosure requirements of NEPA. We have given the EIS an overall rating of EC-2 (Environmental Concerns-Insufficient Information). A description of our rating system is enclosed.

We appreciate the tremendous effort of the Federal Aviation Administration to produce a reader-friendly and succinct document that clearly articulates the anticipated impacts of the proposed project. We believe that the visual graphics, maps, and impact summary tables are very useful to the reader. We also commend the FAA for developing a helpful project website and for hosting numerous stakeholder meetings.

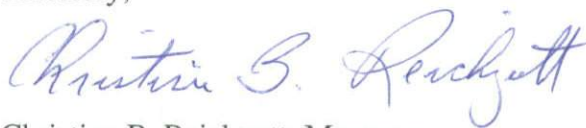
The EIS identifies Alternatives 2 and 7 as FAA's preferred alternatives for Runways 07/25 and 18/36, respectively. Each preferred alternative incorporates an Engineered Material Arresting System and steep fill slopes (2:1), thus greatly minimizing the amount of fill and area of impact. For Runway 18/36, the RSA build-out is primarily on the southern end and away from the mouth of the Buskin River, which avoids direct impacts to that important waterbody. We commend FAA for developing and selecting these preferred alternatives that incorporate such effective avoidance and mitigation.

We continue to have concerns, however, regarding the seemingly unavoidable impacts to marine resources for both the Runway 25 and 36 extensions. These project features will not only contribute to the cumulative impacts to resources from the airport and other surrounding features, but also will likely cause the direct loss of intertidal and subtidal marine habitat, loss of marine life, decreased water quality and reduced habitat connectivity.

While the Draft EIS adequately details the FAA's mandate to increase RSA to the extent practicable, we believe it does not sufficiently quantify the incremental reduction in the extent of personal injury and aircraft damage anticipated with each alternative. We believe this information would be helpful in order to substantiate the resource impacts and project cost. FAA may have statewide or national statistics developed through its RSA program that have quantified the effectiveness of various increases in RSA at airports similar to Kodiak. This information should be utilized to develop an estimate of the increase in safety for each alternative.

Again, we appreciate the opportunity to offer comments on the Draft EIS and look forward to continuing to work with the FAA on addressing the issues we have identified. We also would appreciate continued involvement as the mitigation plan is developed. Please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov or you may contact Jennifer Curtis of my staff in Anchorage at (907) 271-6324 or curtis.jennifer@epa.gov with any questions you have regarding our comments.

Sincerely,



Christine B. Reichgott, Manager
Environmental Review and Sediments Management Unit

Enclosure

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.